

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

WILLIAM WERSINGER,

*

Plaintiff,

*

v.

*

C.A. No. 07-262-GMS

BANK OF AMERICA CORPORATION,*

Defendant.

*

NOTICE OF DEPOSITION FOR BROOKE BASHORE-SMITH

To: Scott Holt, Attorney for Brooke Bashore-Smith
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street – 17th floor
Wilmington, DE 19899-0391

From: Plaintiff William Wersinger

PLEASE TAKE NOTICE that Plaintiff will take the deposition of Brooke Bashore-Smith on Wednesday, May 28, 2008 at 2:00 p.m., by oral examination before a qualified notary public at the law office of the Defendant's attorney identified above.

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
Donald L. Gouge, Jr. (DSB #2234)
800 King Street, Suite 303
PO BOX 1674
Wilmington, DE 19801
(302) 658-1800
(302) 658-1473 (fax)
dgouge@hgdke.com

Dated: May 16, 2008

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

WILLIAM WERSINGER,

*

Plaintiff,

*

v.

*

C.A. No. 07-262-GMS

BANK OF AMERICA CORPORATION,*

Defendant.

*

**NOTICE OF TAKING DEPOSITION FOR CORPORATE DESIGNEE OF
DEFENDANT PURSUANT TO FED. R. CIV. P. 30(b)(6)**

**To: Scott Holt, Attorney for Defendant
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street – 17th floor
Wilmington, DE 19899-0391**

From: Plaintiff William Wersinger

PLEASE TAKE NOTICE that Plaintiff will take the deposition of Defendant's designee or designees by oral examination before a qualified notary public on Thursday, May 29, 2008 at 10:00 a.m., at the law office of the Defendant's attorney identified above.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant is requested to designate the person or persons most knowledgeable and prepared to testify concerning the following subject matters:

- ▶ Any investigation, audit or inquiry into or concerning the classification and/or reclassification of paralegals and/or legal assistants from exempt to non-exempt status or vice versa for three year period preceding the filing of the initial federal court complaint in this case.

- ▶ Any investigation, audit or inquiry into or concerning the classification and/or reclassification of Plaintiff from exempt to non-exempt status or vice versa for three year period preceding the filing of the initial federal court complaint in this case.
- ▶ Any investigation, audit or inquiry into or concerning whether the classification of paralegals and/or legal assistants as exempt from overtime was compliant with the Fair Labor Standards Act or any state law for three year period preceding the filing of the initial federal court complaint in this case.
- ▶ Any and all documents that contain any information relating to the classifications of paralegals and legal assistants as exempt or nonexempt under the Fair Labor Standards Act.
- ▶ Any and all legal advice and all other guidance sought and/or obtained concerning the classification of paralegals and/or legal assistants as exempt or nonexempt for purposes of overtime compensation for the three year period preceding the filing of the initial federal court complaint in this case.

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
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Dated: May 16, 2008

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

WILLIAM WERSINGER,

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Plaintiff,

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v.

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C.A. No. 07-262-GMS

BANK OF AMERICA CORPORATION,*

Defendant.

*

NOTICE OF DEPOSITION FOR SHARON KILLHEFER

**To: Scott Holt, Attorney for Sharon Killhefer
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street – 17th floor
Wilmington, DE 19899-0391**

From: Plaintiff William Wersinger

PLEASE TAKE NOTICE that Plaintiff will take the deposition of Sharon Killhefer on Thursday, May 29, 2008 at 2:00 p.m., by oral examination before a qualified notary public, at the law office of the Defendant's attorney identified above.

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
Donald L. Gouge, Jr. (DSB #2234)
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Dated: May 16, 2008

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

WILLIAM WERSINGER,

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Plaintiff,

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v.

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C.A. No. 07-262-GMS

BANK OF AMERICA CORPORATION,*

Defendant.

*

NOTICE OF DEPOSITION FOR MICHAEL MULLEN

To: Scott Holt, Attorney for Michael Mullen
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street – 17th floor
Wilmington, DE 19899-0391

From: Plaintiff William Wersinger

PLEASE TAKE NOTICE that Plaintiff will take the deposition of Michael Mullen on Tuesday, May 27, 2008 at 2:00 p.m., by oral examination before a qualified notary public, at the law office of the Defendant's attorney identified above.

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
Donald L. Gouge, Jr. (DSB #2234)
800 King Street, Suite 303
PO BOX 1674
Wilmington, DE 19801
(302) 658-1800
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dgouge@hgdke.com

Dated: May 16, 2008

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

WILLIAM WERSINGER,

*

Plaintiff,

*

v.

*

C.A. No. 07-262-GMS

BANK OF AMERICA CORPORATION,*

Defendant.

*

NOTICE OF DEPOSITION FOR HENRY MONCURE

To: Scott Holt, Attorney for Henry Moncure
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street – 17th floor
Wilmington, DE 19899-0391

From: Plaintiff William Wersinger

PLEASE TAKE NOTICE that Plaintiff will take the deposition of Henry Moncure on Tuesday, May 27, 2008 at 10:00 a.m., by oral examination before a qualified notary public, at the law office of the Defendant's attorney identified above.

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234
Donald L. Gouge, Jr. (DSB #2234)
800 King Street, Suite 303
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Wilmington, DE 19801
(302) 658-1800
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Dated: May 16, 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM WERSINGER,)	
Plaintiff,)	
)	
v.)	C.A. No. 07-262(GMS)
)	
BANK OF AMERICA CORPORATION,)	JURY TRIAL REQUESTED
Defendant.)	

CERTIFICATE OF SERVICE

I certify that a copy of the plaintiff's notices of deposition for Henry Moncure, Michael Mullen, Sharon Killhefer, Brooke Bashore-Smith and a 30(b)(6) representative was sent via Pacer electronic filing and by hand on the following:

Sheldon N. Sandler, Esquire (HAND)
Scott A. Holt, Esquire
1000 West Street, 17th Floor
Wilmington, DE 19801

/s/ Donald L. Gouge, Jr. #2234
DONALD L. GOUGE, JR. (#2234)
800 N. King Street, Suite 303
Wilmington, DE 19801
(302) 658-1800x2
Attorney for plaintiff

DATED: May 16, 2008